

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)

v.)

BRANDON SOBOTTA,)

Defendant.)

No. 1:19-cr-112 (LO)



STATEMENT OF FACTS

The parties stipulate that the following facts are true and correct and that, had the matter gone to trial, the United States would have proven them beyond a reasonable doubt.

1. The defendant, Brandon Sobotta, has known Richard Pak since middle school. Beginning in or about 2011, and continuing thereafter until in or about late 2018, except for periods during which the defendant was incarcerated, Richard Pak distributed marijuana to the defendant, which the defendant then distributed to others. Beginning in or about 2017, and continuing thereafter until in or about late 2018, Richard Pak distributed cocaine to the defendant, which the defendant distributed to others. During this time, the defendant also began using cocaine obtained from Richard Pak.

2. On or about September 25, 2018, Richard Pak asked the defendant to deliver cocaine to a customer in the Centreville area. The defendant agreed. Richard Pak thereafter gave the defendant approximately three ounces of cocaine. Richard Pak instructed the defendant as to how the defendant was to deliver the cocaine to a customer.

3. Shortly after 8:00 p.m. on September 25, 2018, the defendant contacted the customer by telephone (by both voice and text message), to arrange a meeting. The customer was, in fact, an undercover police officer (UC). The defendant and the UC then met in the UC's

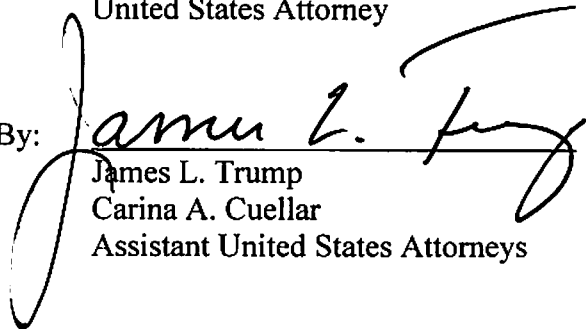
vehicle near a residence on Golden Oak Road in Centreville, Virginia, in the Eastern District of Virginia. At that location, the defendant distributed approximately three ounces of cocaine (89.74 grams) in a clear plastic bag to the UC. In exchange, the UC gave the defendant \$4,600 in cash. Following the transaction, the defendant delivered the money to Spencer Pak.

4. The acts taken by the defendant, Brandon Sobotta, in furtherance of the offense charged in this case, including the acts described above, were done willfully and knowingly with the specific intent to violate the law. The defendant acknowledges that the foregoing statement of facts does not describe all of the defendant's conduct relating to the offenses charged in this case nor does it identify all of the persons with whom the defendant may have engaged in illegal activities. The defendant further acknowledges that he is obligated under his plea agreement to provide additional information about this case beyond that which is described in this statement of facts.

Respectfully submitted,

G. Zachary Terwilliger
United States Attorney

By:


James L. Trump
Carina A. Cuellar
Assistant United States Attorneys

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, Brandon Sobotta, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate and that, had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

Date: 5/19/2019

~~5/19/2019~~ [Signature]
Brandon Sobotta
Defendant

I am Brandon Sobotta's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

Date: 5/19/2019

[Signature]
Joseph T. Flood
Counsel for the Defendant